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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
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July 27, 2007

Larry D. Romine
Federal Project Director
U.S. Department of Energy
Richland Operations Office
PO Box 550, A6-33
Richland, WA 99352

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EDMC

Re: 200 Area Key Facility Surveillance and Maintenance Plans

Dear Mr. Romine:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft revisions of the surveillance and maintenance (S & M) plans for key facilities in the 200 Area (including B-Plant, PUREX, REDOX, U-Plant, and the UO3 Plant). This review was performed in accordance with Section 8.5.4 of the Tri-Party Agreement Action Plan. EPA concentrated the review effort on facilities where we either have the lead regulator role or share regulatory responsibilities with the Washington Department of Ecology (Ecology). These facilities include REDOX, U-Plant, and the UO3 Plant.

EPA recognizes that these documents are produced more for DOE purposes than for those of the regulatory agencies. However, our comments should benefit all parties by improving the usefulness of the S & M plans. EPA's comments are provided below. Unless otherwise specified, comments are applicable to all of the plans submitted by the U.S. Department of Energy (DOE).

1. Each of the S & M plan drafts is more like an outline of a plan than a plan. They are somewhat streamlined from the earlier approved versions, but this is not beneficial. It is hard to see how an employee (especially a new one) could take these documents and understand what is to be done or even what the current supporting materials are and where to find them.
2. To expand on comment #1, the usual comment EPA makes on work plans applies here. If the document doesn't contain enough detail to describe just what is to be done, it needs to reference what regulation or external procedure it complies with or name the internal work document containing the procedure(s) including its name, document number, and the date it was issued. By being this specific, the plan becomes useful enough to fulfill the purpose for which it was intended.
3. EPA would like to sit down with DOE and Ecology and do a walk through of a task or two and go from the work plan to the specific documents and procedures that support the

plan for those tasks. DOE would need to provide the materials for this review, including contractor documents. The purpose of this review would be to verify that someone can actually follow the references to the correct procedures or specific task descriptions that support the S & M activities.

4. There is a commitment by DOE in the Hanford sitewide institutional controls (ICs) plan to provide an update every September on the effectiveness of ICs at the various unit manager meetings. One of the sources of information that feeds into this reporting function is the S & M program. These S & M activities and the information gained from them need to support this reporting function. The S & M activities aren't limited to soil waste sites, but also include buildings. The S & M plans are not consistent with the sitewide IC plan. They should be modified so that information coming out of the program feeds the needs of the sitewide IC annual reporting (at unit manager meetings) and the sitewide IC roll-up that takes place every five years prior to CERCLA 5-Year Reviews.
5. There needs to be a better description of when the S & M program transitions to the CERCLA or cleanup program and when ICs called for in RODs take effect. Many of the S & M activities will continue to be necessary to ensure that ICs are implemented, especially for phased remediation where portions of these facilities will remain untouched by active remediation for years. These activities need to be described in the RD/RA work plans along with other tasks necessary to implement the ICs. This is similar to the comments EPA has made on the 221-U Facility RD/RA work plan and how the details of IC implementation need to be added to the document.

The section on Institutional Controls in the plan for UO3 is correct in that there are no ICs for this facility. However, it is grossly in error when indicating that there isn't a CERCLA decision document for the facility. In fact all of the U Plant Ancillary Facilities are covered by a non-time critical removal action through the action memorandum (DOE/RL-2004-67). It is hard to understand how a mistake like this makes it into a product delivered for regulatory review. The S & M plan is necessary for this facility because there are no formal ICs and the second phase of the removal action (including demolition of UO3 or the 224-U building) has been placed on hold due to funding constraints and priorities.

6. Revision of the S & M plan for the U Plant may not be necessary as the 221-U Facility RD/RA work plan will be finalized in the next few months. However, some of the changes to the S & M plan may need to be factored into the description of similar tasks necessary to implement ICs as described in the RD/RA work plan.
7. The description of the risk posed by these facilities and the effectiveness of the S & M program is, at times, in opposition with the case that has to be made for using CERCLA remedial or removal actions to address the hazards represented by the contaminants in these buildings. EPA would like the opportunity to meet with DOE to clarify this comment so that it is fully understood. Also, while some of the S & M activities may not require HAZWOPER training, DOE should remove the blanket statement that there aren't conditions requiring the use of workers with this training; since the facilities face

eventual cleanup under CERCLA. This is especially true considering the recent ROD for the 221-U Facility.

8. There should be a short section discussing contractor transition.
9. Each of these plans needs to include a discussion of the rationale for S & M waste being allowed to go to ERDF.
10. It would be highly beneficial to include a blank form that is used by S & M personnel when conducting surveillances.
11. The role of the regulatory agencies is not explained in these plans. It should be clearly spelled out (consistent with the Tri-Party Agreement Action Plan) and there should be an approval page for signatures depending on lead or dual-lead regulator status.

This concludes EPA's comments on the 200 Area key facility S & M plans provided by DOE for review. If you have questions, please contact me at 509 376-8665. Also, please contact me to arrange for a meeting as requested in the comments contained in this letter.

Sincerely,



Craig Cameron
Project Manager

cc: Rick Bond, Ecology
Beth Bilson, FH
Julie Robertson, FH
Dave Bartus, EPA

Administrative Record: S & M Plans (Key facilities including B-Plant, PUREX,
REDOX, U-Plant and UO3 Plant)

U Plant AA

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